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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

June 26, 2007

Ms. Shirley J. Olinger, Acting Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Mr. William S. Elkins, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: H4-02  
Richland, Washington 99354

**RECEIVED**  
JUN 28 2007  
**EDMC**

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form 24590-HLW-PCN-ENV-06-021; Class <sup>1</sup>1 Modification to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10 (Waste Treatment and Immobilization Plant), WA7890008967

0072982

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology is denying the referenced Class <sup>1</sup>1 Modification for the reasons stated below. The denied Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-HLW-PCN-ENV-06-021 updates the Silver Mordenite Column Mechanical Data Sheets 24590-HLW-MKD-HOP-P0014 and 24590-HLW-MKD-HOP-P0017.

We found the following errors during our review:

- The Component Plant Item Number on Mechanical Data Sheet 24590-HLW-MKD-HOP-P0017 should be changed to 24590-HLW-MV-HOP-ABS-00003.
- The referenced Process Data Sheets, 24590-HLW-MKD-HOP-00012/00018, have been cancelled and should be deleted.
- The Hanford Facility RCRA Permit Modification Notification Form failed to list the changes to the maximum outside dimensions for the silver mordenite columns.



Ms. Olinger and Mr. Elkins

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We brought these errors to the attention of Bechtel National, Inc. staff. They decided to correct the errors and submit a new Hanford Facility RCRA Permit Modification Notification Form.

If there are any questions, contact me at 509-372-7882 or Ed Fredenburg at 509-372-7899.

Sincerely,



Brenda Becker-Khaleel  
Lead WTP Permit Writer  
Nuclear Waste Program

trw/jc  
Enclosure

cc electronic w/enc:

John Eschenberg, USDOE  
Lori Huffman, USDOE  
Tony McKarns, USDOE  
Gae Neath, USDOE  
Don Sommer, USDOE  
William Taylor, USDOE  
Julie Atwood, BNI  
Brad Erlandson, BNI  
Peggy Fisher, BNI  
Stan Hill, BNI  
Dennis Klein, BNI  
Sandi Murdock, BNI  
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements ✓  
Environmental Portal  
USDOE-ORP Correspondence Control

Quarter Ending 06/30/07

24590-HLW-PCN-ENV-06-021

**Hanford Facility RCRA Permit Modification Notification Form**

Unit:

**Waste Treatment and Immobilization Plant**

Permit Part &amp; Chapter:

**Part III, Chapter 10 and Attachment 51**Description of Modification:

This modification updates the HLW Facility Melter 1 and 2 Silver Mordenite Column Mechanical Systems Data Sheets (24590-HLW-MKD-HOP-P0014 and 24590-HLW-MKD-HOP-P0017) located in Appendix 10.6 of the Dangerous Waste Permit. The silver mordenite columns have been installed in the HLW facility in 2005; the purpose of this PCN is to update the mechanical data sheets to include design details provided by the vendor and other minor editorial changes.

The changes are summarized as follows:

- Revised Seismic Base Moment from TBD to data provided by the vendor
- Revised Support Type from TBD to data provided by the vendor
- Revised Nozzles Sampling & Testing Connections from TBD to data provided by the vendor
- Revised Note 1 by adding tolerances to the unit dimensions
- Reinstated Note 4 deleted from the previous revision to the permit data sheets. Note 4 clarifies that the updated data sheet supercedes the information contained in the supplier deviation request.
- Reinstated the reference to Process Data Sheet deleted from the previous revision to the permit data sheet.
- Added the Safety Screening block and the E&NS signature column.

Please replace the following documents in Appendix 10.6 of the Dangerous Waste Permit:

Appendix 10.6				
Replace:	24590-HLW-MKD-HOP-P0014, rev. 1	With:	24590-HLW-MKD-HOP-P0014, rev. 2	
	24590-HLW-MKD-HOP-P0017, rev. 0		24590-HLW-MKD-HOP-P0017, rev. 1	
WAC 173-303-830 Modification Class: <sup>1,2</sup>		Class 1	Class 1	Class 2
Please mark the Modification Class:			X	

Enter Relevant WAC 173-303-830, Appendix I Modification citation number: N/A

Enter wording of WAC 173-303-830, Appendix I Modification citation: N/A

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment."

Modification Approved: ☐ Yes ☒ No (state reason for denial)

Reviewed by Ecology:

Reason for denial:

errors on Mechanical Data Sheet

*S. Dahl* 6/26/07  
S. Dahl Date

<sup>1</sup> Class 1 modifications requiring prior Agency approval.

<sup>2</sup> If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.